

File No.: 53575
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UNITED STATES
BANKRUPTCY COURT FOR
THE DISTRICT OF NEW
JERSEY

IN RE:
ASSUNCAO BROS., INC.

CHAPTER 11
CASE NO: 22-16159(CMG)
HEARING DATE: 1-3-2023

STATEMENT AS TO WHY NO BRIEF IS NECESSARY IN
ACCORDANCE WITH LOCAL RULES OF BANKRUPTCY PRACTICE

The within Notice of Motion requests relief from the automatic stay on the grounds, as set forth on the accompanying Certification, that the Movant has a perfected security interest in the Motor Vehicle owned by the Debtor, Assuncao Bros., Inc. and there has been a default.

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

Date: 12-9-2022

/s/ John R. Morton, Jr., Esquire
John R. Morton, Jr., Esquire
Attorney for Santander Consumer USA
Inc. dba Chrysler Capital